

B1109

BENTLEY PHARMACEUTICALS, INC.									
Management Fees Calculation									
TOTAL MAY-DEC 1998									
	JRMurphy	MDPrice	RMStote	EMelia	CDBrown	July - Dec Total	May - Dec Calculated Total	Per Backup	
Salaries/Wages	\$ 137,502	\$ 80,958	\$ 87,678	\$ 44,323	\$ 18,943	\$ 369,404	\$ 492,539	\$ 732,660	488440
Benefits 7.51%	13,771	8,188	9,419	4,512	1,836	37,726	50,301		
Outside Services	141,600	164,100	600	23,100	600	330,000	440,000		
Travel/Entertainment	25,044	24,557	5,000	-	-	54,601	72,801		
Occupancy	10,610	10,610	10,610	10,610	10,610	53,050	70,733		
Supplies/Maint.	2,469	2,469	2,469	2,469	2,469	12,345	16,460		
Communication	42,948	42,948	-	42,948	-	128,844	171,792		
Directors Fees/Ins.	15,197	15,197	15,197	-	-	45,591	60,788		
Other gen & admin	6,448	6,448	6,448	6,448	6,448	32,240	42,987		
Sub-totals	\$ 395,569	\$ 355,475	\$ 137,421	\$ 134,410	\$ 40,906	\$ 1,063,801	\$ 1,418,401		
Percent	50	60	80	70	50				
Allocation	\$ 197,795	\$ 178,335	\$ 109,937	\$ 94,087	\$ 20,453	\$ 600,606	\$ 800,808		
Total									
Say					\$ 600,606		\$ 800,808		
Peseta/\$					\$ 600,600		\$ 800,800		
Amount of Invoice in Pesetas					146,986,779		146,986,779		
					88,281,400		117,708,533		
							97,100,496		

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B1110

		BENTLEY PHARMACEUTICALS, INC.					
		Management Fees Calculation					
		JULY 1998					
		JRMurphy	MDPrice	RMStote	EMelia	CDBrown	
Salaries/Wages		\$ 20,417	\$ 12,500	\$ 18,750	\$ 7,651	\$ 2,963	
Benefits 10.85%		2,215	1,356	2,034	830	321	
Outside Services		23,600	27,350	100	3,850	100	
Travel/Entertainment		3,215	3,053	526	-	-	
Occupancy		2,130	2,130	2,130	2,130	2,130	
Supplies/Maint.		343	343	343	343	343	
Communication		7,158	7,158	-	7,158	-	
Directors Fees/Ins.		5,985	5,985	5,985	-	-	
Other gen & admin		940	940	940	940	940	
Sub-totals		\$ 66,003	\$ 60,815	\$ 30,808	\$ 22,902	\$ 6,797	
Percent		50	40	80	70	50	
Allocation		\$ 33,002	\$ 24,326	\$ 24,646	\$ 16,031	\$ 3,399	
Total						\$ 101,404	
Say						\$ 101,400	
Peseta/\$						152.592212	
Amount of Invoice in Pesetas						15,472,850	

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B1111

		BENTLEY PHARMACEUTICALS, INC.					
		Management Fees Calculation					
		AUG 1998					
		JRMurphy	MDPrice	RMStote	EMelia	CDBrown	
Salaries/Wages		\$ 20,417	\$ 12,500	\$ 18,750	\$ 7,651	\$ 2,963	
Benefits 8.1%		1,654	1,012	1,519	620	240	
Outside Services		23,600	27,350	100	3,850	100	
Travel/Entertainment		3,215	3,053	526	-	-	
Occupancy		2,130	2,130	2,130	2,130	2,130	
Supplies/Maint.		312	312	312	312	312	
Communication		7,158	7,158	-	7,158	-	
Directors Fees/Ins.		1,755	1,755	1,755	-	-	
Other gen & admin		994	994	994	994	994	
Sub-totals		\$ 61,235	\$ 56,264	\$ 26,086	\$ 22,715	\$ 6,739	
Percent		50	40	80	70	50	
Allocation		\$ 30,618	\$ 22,506	\$ 20,869	\$ 15,901	\$ 3,370	
Total						\$ 93,262	
Say						\$ 93,200	
Peseta/\$						151.75915	
Amount of Invoice in Pesetas						14,143,953	

B1112

		BENTLEY PHARMACEUTICALS, INC.				
		Management Fees Calculation				
		SEP 1998				
		JRMurphy	MDPrice	RMStote	EMelia	CDBrown
Salaries/Wages		\$ 20,417	\$ 12,500	\$ 18,049	\$ 7,651	\$ 2,963
Benefits 14.2%		2,899	1,775	2,563	1,086	421
Outside Services		23,600	27,350	100	3,850	100
Travel/Entertainment		3,215	3,053	526	-	-
Occupancy		2,130	2,130	2,130	2,130	2,130
Supplies/Maint.		350	350	350	350	350
Communication		7,158	7,158	-	7,158	-
Directors Fees/Ins.		1,692	1,692	1,692	-	-
Other gen & admin		1,664	1,664	1,664	1,664	1,664
Sub-totals		\$ 63,125	\$ 57,672	\$ 27,074	\$ 23,889	\$ 7,628
Percent		50	40	80	70	50
Allocation		\$ 31,563	\$ 23,069	\$ 21,659	\$ 16,722	\$ 3,814
Total						\$ 96,827
Say						\$ 96,800
Peseta/\$						144.4596383
Amount of Invoice in Pesetas						13,983,693

B1113

		BENTLEY PHARMACEUTICALS, INC.				
		Management Fees Calculation				
		OCT 1998				
		<u>JRMurphy</u>	<u>MDPrice</u>	<u>RMStote</u>	<u>EMelia</u>	<u>CDBrown</u>
Salaries/Wages		\$ 20,417	\$ 12,500	\$ 13,607	\$ 7,651	\$ 2,963
Benefits 14.6%		2,981	1,825	1,987	1,117	433
Outside Services		23,600	27,350	100	3,850	100
Travel/Entertainment		4,159	4,158	924	-	-
Occupancy		2,158	2,158	2,158	2,158	2,158
Supplies/Maint.		534	534	534	534	534
Communication		7,158	7,158	-	7,158	-
Directors Fees/Ins.		2,255	2,255	2,255	-	-
Other gen & admin		1,014	1,014	1,014	1,014	1,014
Sub-totals		\$ 64,276	\$ 58,952	\$ 22,579	\$ 23,482	\$ 7,202
Percent		50	60	80	70	50
Allocation		\$ 32,138	\$ 35,371	\$ 18,063	\$ 16,437	\$ 3,601
Total						\$ 105,611
Say						\$ 105,600
Peseta/\$						139.26
Amount of Invoice in Pesetas						14,705,856

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B1115

		BENTLEY PHARMACEUTICALS, INC.					
		Management Fees Calculation					
		DEC 1998					
		JRMurphy	MDPrice	RMStote	EMelia	CDBrown	
Salaries/Wages		\$ 35,417	\$ 18,458	\$ 9,570	\$ 6,068	\$ 4,128	
Benefits 7.51%		2,660	1,386	719	349	223	
Outside Services		23,600	27,350	100	3,850	100	
Travel/Entertainment		6,854	6,854	1,523	-	-	
Occupancy		1,501	1,501	1,501	1,501	1,501	
Supplies/Maint.		654	654	654	654	654	
Communication		7,158	7,158	-	7,158	-	
Directors Fees/Ins.		1,755	1,755	1,755	-	-	
Other gen & admin		901	901	901	901	901	
Sub-totals		\$ 80,500	\$ 66,017	\$ 16,723	\$ 20,481	\$ 7,507	
Percent		50	60	80	70	50	
Allocation		\$ 40,250	\$ 39,610	\$ 13,378	\$ 14,337	\$ 3,754	
Total						\$ 111,329	
Say						\$ 111,300	
Peseta/\$						142.02	
Amount of Invoice in Pesetas						15,806,826	

B1116

Bentley Pharmaceuticals, Inc.							
Intercompany Management Fee							
May 1998-December 1998							
	Management		Management		Management		
	Fee (A)		Fee (B)		Fee (C)		
	<i>pesetas</i>	<i>US\$</i>	<i>pesetas</i>	<i>US\$</i>	<i>pesetas</i>	<i>US\$</i>	
Q1 1998	25,000,000	162,000	-	-	-	-	
Apr-98	8,333,333	54,000	-	-	-	-	
	33,333,333	216,000	-	-	-	-	
May-98	-	-	5,000,000	33,000	5,000,000	33,000	
Jun-98	-	-	5,000,000	33,000	5,000,000	33,000	
Jul-98	-	-	5,000,000	33,000	15,472,850	101,400	
Aug-98	-	-	5,000,000	33,000	14,143,953	93,200	
Sep-98	-	-	5,000,000	35,000	13,983,693	96,800	
YTD 1998	33,333,333	216,000	25,000,000	167,000	53,600,496	357,400	
Adjustment	20,267,163	141,400	28,600,496	190,400	-	-	
Adj YTD 1998	53,600,496	\$ 357,400	53,600,496	\$357,400	53,600,496	\$357,400	
Oct-98	14,500,000	104,124	14,500,000	104,124	14,705,856	105,602	
Nov-98	14,500,000	101,405	14,500,000	101,405	13,183,678	92,199	
Dec-98	14,500,000	102,100	14,500,000	102,100	15,806,826	111,302	
	97,100,496	665,029	97,100,496	665,029	97,296,856	666,503	
					Difference	1,475	
Inc Tax Effect of adjustment	7,093,507	\$ 49,490					
(A) Recorded on US GAPP books							
(B) Recorded on Spain statutory books							
(C) What should be recorded on US GAAP and Spain statutory books							

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B1117

Bentley Pharmaceuticals, Inc.			
Management Fee Summary			
For the year ended December 31, 1999			
	<i>(in pesetas)</i>		
		Per Interco	
	Monthly Calc	Invoice	Per Spain F/S
January	13,532,568	14,500,000	14,500,000
February	16,885,779	15,213,000	15,213,000
March	18,102,284	15,213,000	15,213,000
April	21,254,538	15,000,000	15,000,000
May	18,097,769	15,000,000	15,000,000
June	21,035,805	15,000,000	15,000,000
July	17,324,846	15,000,000	15,000,000
August	18,752,754	15,000,000	15,000,000
September	20,116,950	15,000,000	15,000,000
October	16,829,258	15,000,000	15,000,000
November	19,055,858	15,000,000	15,000,000
December	24,051,488	60,113,896	101,068,000
	225,039,896	225,039,896	265,994,000
1999 Senioral Royalty		38,935,606	
Intercompnay - Chile		2,018,498	
Per Spain F/S		265,994,000	

B1118

BENTLEY PHARMACEUTICALS, INC.											
Management Fees Calculation											
TOTAL 1999											
	JRMurphy	MDPrice	RMState	RJGyark	IVelazco	EMella	CDBrown	Total	Per GL	Difference	
Salaries/Wages	\$ 294,944	\$ 171,231	\$ 108,158	\$ 99,808	\$ 29,444	\$ 82,856	\$ 38,921	\$ 825,162			
Benefits 25%	44,830	28,062	17,653	13,490	3,355	13,043	5,815	124,288			
Outside Services	271,729	326,900	11,118	21,236	400	50,081	33,972	715,436	667,238	48,198	* only allocated \$100 to State, Gyark had Velazco
Travel/Entertainment	96,830	21,521	8,808	1,650	-	1,051	948	130,808	132,084	(1,276)	
Occupancy	19,135	13,035	13,035	11,779	5,679	13,035	13,035	88,794	88,737	(57)	
Supplies/Maint.	10,984	3,662	10,984	10,314	8,015	3,662	3,662	51,283	51,301	(18)	
Communication	76,632	91,958	1,200	1,000	600	12,811	7,379	191,580	191,607	(27)	
Directors Fees/Ins.	10,365	10,365	10,365	8,258	-	-	-	39,352		39,352	
Other gen & admin	24,367	24,367	9,341	3,472	3,472	24,367	24,367	113,751	113,763	(12)	* Included R&D refo
Sub-totals	\$ 849,815	\$ 689,101	\$ 190,702	\$ 171,008	\$ 50,965	\$ 200,705	\$ 128,089	2,280,394			
Percent	60%	50%	80%	60%	50%	70%	50%				
Allocation	\$ 509,894	\$ 344,556	\$ 152,562	\$ 85,739	\$ 25,483	\$ 140,495	\$ 64,050	1,322,778			
Total							\$ 1,322,778				
Cost + %							8.65%				
Say							\$ 1,437,198				
Peelata\$							\$ 1,437,200				
Amount of Invoice in Pesetas - calculated							156,15528				
Amount of Invoice in Pesetas - actual							224,426,368				
							225,039,896				

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B1120

	BENTLEY PHARMACEUTICALS, INC.						
	Management Fees Calculation						
	FEBRUARY 1999						
	JRMurphy	MDPrice	RMStote	EMelia	CDBrown		
Salaries/Wages	\$ 24,166	\$ 14,000	\$ 15,722	\$ 7,650	\$ 2,962		\$ 64,500
Benefits 20%	4,833	2,800	3,144	1,530	592	12,900	
Outside Services	26,374	31,648	100	4,615	3,197	65,934	
	40%	48%		7%	5%	65,934	
Travel/Entertainment	(58)	-	-	-	-		
Occupancy	1,187	1,187	1,187	1,187	1,187		
Supplies/Maint.	58	58	58	58	58		
Communication	7,145	8,574	100	1,250	793	17,862	
	40%	48%		7%	5%	17,862	
Directors Fees/Ins.	1,053	1,053	1,053	-	-		
Other gen & admin	1,043	1,043	1,043	1,043	1,043		
Sub-totals	\$ 65,802	\$ 60,365	\$ 22,408	\$ 17,334	\$ 9,833		
Percent	60%	50%	80%	70%	50%		
Allocation	\$ 39,481	\$ 30,182	\$ 17,927	\$ 12,134	\$ 4,916		\$ 104,641
Total					\$ 104,641		
Cost + %					8.65%		
Say					\$ 113,692		
Peseta/\$					\$ 113,700		
Amount of Invoice in Pesetas					148,51169		
					16,885,779		

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B1121

BENTLEY PHARMACEUTICALS, INC. Management Fees Calculation MARCH 1999									
	JRMurphy	MDPrice	RMStote	RJGyurik	EMelia	CDBrown			
Salaries/Wages	\$ 24,166	\$ 14,000	\$ 15,169	\$ 7,500	\$ 7,650	\$ 2,962			\$ 71,447
Benefits 25%	6,042	3,500	3,792	1,875	1,913	741			17,862
Outside Services	26,941	32,329	100	100	4,715	3,168			67,353
	40%	48%			7%	5%			67,353
Travel/Entertainment	2,329	-	1,097	-	-	-			
Occupancy	1,187	1,187	1,187	-	1,187	1,187			
Supplies/Maint.	119	119	119	-	119	119			
Communication	3,870	4,644	100	100	677	284			9,675
	40%	48%			7%	5%			9,675
Directors Fees/Ins.	878	878	878	878	-	-			
Other gen & admin	1,485	1,485	1,485	-	1,485	1,485			
Sub-totals	\$ 67,017	\$ 58,143	\$ 23,927	\$ 10,453	\$ 17,746	\$ 9,945			
Percent	60%	50%	80%	30%	70%	50%			
Allocation	\$ 40,210	\$ 29,072	\$ 19,142	\$ 3,136	\$ 12,422	\$ 4,973			\$ 108,954
Total						\$ 108,954			
Cost + %						8.65%			
Say						\$ 118,378			
Peseta/\$						\$ 118,400			
Amount of Invoice in Pesetas						152,890,913			
						18,102,284			

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B1123

	BENTLEY PHARMACEUTICALS, INC.									
	Management Fees Calculation									
	MAY 1999									
	JRMurphy	MDPrice	RMStote	RJGyurik	EMelia	CDBrown				
Salaries/Wages	\$ 24,166	\$ 14,000	\$ 7,943	\$ 10,000	\$ 7,650	\$ 3,170				\$ 66,929
Benefits 15%	3,625	2,100	1,191	1,500	1,148	476				10,039
Outside Services	27,038	32,445	100	100	4,732	3,180				67,594
	40%	48%			7%	5%				67,594
Travel/Entertainment	14,169	-	56	(363)	-	-				
Occupancy	1,197	1,197	1,197	-	1,197	1,197				
Supplies/Maint.	541	541	541	541	541	541				
Communication	5,692	6,830	100	100	996	512				14,230
	40%	48%			7%	5%				14,230
Directors Fees/Ins.	878	878	878	878	-	-				
Other gen & admin	569	569	569	-	569	569				
Sub-totals	\$ 77,875	\$ 58,561	\$ 12,575	\$ 12,755	\$ 16,832	\$ 9,643				
Percent	60%	50%	80%	30%	70%	50%				
Allocation	\$ 46,725	\$ 29,280	\$ 10,060	\$ 3,827	\$ 11,782	\$ 4,822				\$ 106,496
Total						\$ 106,496				
Cost + %						8.65%				
Say						\$ 115,708				
Peseta/\$						\$ 115,700				
Amount of Invoice in Pesetas						156,41978				
						18,097,769				

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B1125

BENTLEY PHARMACEUTICALS, INC.											
Management Fees Calculation											
JULY 1999											
	JRMurphy	MDPrice	RMStote	RJGyurik	IVelazco	EMelia	CDBrown				
Salaries/Wages	\$ 24,166	\$ 14,000	\$ 7,682	\$ 10,000	\$ 4,708	\$ 6,718	\$ 3,170				\$ 70,444
Benefits 15%	3,625	2,100	1,152	1,500	706	1,008	476				10,567
Outside Services	16,030	19,236	100	100	-	2,805	1,804				40,075
	40%	48%				7%	5%				40,075
Travel/Entertainment	1,579	684	1,169	252	-	-	-				
Occupancy	1,398	1,398	1,398	1,398	1,398	1,398	1,398				
Supplies/Maint.	1,289	212	1,289	1,289	1,289	212	212				
Communication	7,498	8,998	100	100	100	1,212	737				18,746
	40%	48%				7%	5%				18,746
Directors Fees/Ins.	658	658	658	658	-	-	-				
Other gen & admin	1,657	1,657	441	441	441	1,657	1,657				
Sub-totals	\$ 57,900	\$ 48,943	\$ 13,989	\$ 15,738	\$ 8,642	\$ 15,009	\$ 9,453				
Percent	60%	50%	80%	60%	50%	70%	50%				
Allocation	\$ 34,740	\$ 24,472	\$ 11,191	\$ 9,443	\$ 4,321	\$ 10,507	\$ 4,726				\$ 99,400
Total							\$ 99,400				
Cost + %							8.65%				
Say							\$ 107,998				
Peseta/\$							\$ 108,000				
Amount of Invoice in Pesetas							160,41524				
							17,324,846				

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B1127

	BENTLEY PHARMACEUTICALS, INC.									
	Management Fees Calculation									
	SEPTEMBER 1999									
	JRMurphy	MDPrice	RMSStote	RJGvurik	IVelazco	EMelia	CDBrown			
Salaries/Wages	\$ 24,166	\$ 14,000	\$ 6,250	\$ 10,000	\$ 4,708	\$ 5,786	\$ 3,170			\$ 68,080
Benefits 10%	2,417	1,400	625	1,000	471	579	317			6,808
Outside Services	16,377	19,850	2,481	4,963	100	3,474	2,381			49,626
	33%	40%	5%	10%		7%	5%			49,626
Travel/Entertainment	10,242	646	885	1,483	-	524	-			
Occupancy	1,448	1,448	1,448	1,448	1,448	1,448	1,448			
Supplies/Maint.	(328)	50	(328)	(328)	(328)	50	50			
Communication	5,083	6,099	100	100	100	789	435			12,707
	40%	48%				7%	5%			12,707
Directors Fees/Ins.	858	858	858	858	-	-	-			
Other gen & admin	7,579	7,579	1,832	1,832	1,832	7,579	7,579			
Sub-totals	\$ 67,842	\$ 51,932	\$ 14,151	\$ 21,356	\$ 8,331	\$ 20,230	\$ 15,382			
Percent	60%	50%	80%	60%	50%	70%	50%			
Allocation	\$ 40,705	\$ 25,966	\$ 11,321	\$ 12,813	\$ 4,166	\$ 14,161	\$ 7,691			\$ 116,823
Total							\$ 116,823			
Cost + %							8.65%			
Say							\$ 126,928			
Peseta/\$							\$ 126,900			
Amount of Invoice in Pesetas							158,526,004			
							20,116,950			

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BENTLEY PHARMACEUTICALS, INC.									
Management Fees Calculation									
OCTOBER 1999									
	JRMurphy	MDPrice	RMSStote	RJGyurik	IVelazco	EMelia	CDBrown		
Salaries/Wages	\$ 24,166	\$ 14,000	\$ 6,250	\$ 10,000	\$ 4,708	\$ 5,786	\$ 3,170		\$ 68,080
Benefits 10%	2,417	1,400	625	1,000	471	579	317		6,808
Outside Services	11,916	14,443	1,805	3,611	100	2,528	1,705		36,108
	33%	40%	5%	10%		7%	5%		36,108
Travel/Entertainment	28,684	-	1,842	79	-	-	-		
Occupancy	646	646	646	646	646	646	646		
Supplies/Maint.	891	98	891	891	891	98	98		
Communication	4,694	5,633	100	100	100	722	387		11,736
	40%	48%				7%	5%		11,736
Directors Fees/Ins.	858	858	858	858	-	-	-		
Other gen & admin	737	737	238	238	238	737	737		
Sub-totals	\$ 74,989	\$ 37,816	\$ 13,055	\$ 17,423	\$ 7,154	\$ 11,094	\$ 7,060		
Percent	60%	50%	80%	60%	50%	70%	50%		
Allocation	\$ 44,993	\$ 18,908	\$ 10,444	\$ 10,454	\$ 3,577	\$ 7,766	\$ 3,530		\$ 99,672
Total									
Cost + %									
Say									
Peseta/\$									
Amount of Invoice in Pesetas									

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B1129

	BENTLEY PHARMACEUTICALS, INC.								
	Management Fees Calculation								
	NOVEMBER 1999								
	JRMurphy	MDPrice	RMSStote	RJGyunk	IVelazco	EMelia	CDBrown		
Salaries/Wages	\$ 24,166	\$ 14,000	\$ 6,250	\$ 10,000	\$ 4,708	\$ 5,786	\$ 3,170		\$ 68,080
Benefits 15%	3,625	2,100	938	1,500	706	868	476	10,212	9,424
Outside Services	16,186	19,620	2,452	4,905	100	3,433	2,352	49,049	
	33%	40%	5%	10%		7%	5%	49,049	
Travel/Entertainment	16,829	1,001	-	85	-	527	-		
Occupancy	646	646	646	646	646	646	646		
Supplies/Maint.	2,000	1,381	2,000	2,000	2,000	1,381	1,381		
Communication	5,439	6,527	100	100	100	852	480	13,597	
	40%	48%				7%	5%	13,597	
Directors Fees/Ins.	858	858	858	858	-	-	-		
Other gen & admin	1,157	1,157	463	463	463	1,157	1,157		
Sub-totals	\$ 70,906	\$ 47,290	\$ 13,707	\$ 20,557	\$ 8,723	\$ 14,650	\$ 9,662		
Percent	60%	50%	80%	60%	50%	70%	50%		
Allocation	\$ 42,544	\$ 23,645	\$ 10,965	\$ 12,334	\$ 4,362	\$ 10,255	\$ 4,831	\$ 108,935	
Total							\$ 108,935		
Cost + %							8.65%		
Say							\$ 118,358		
Peseta/\$							\$ 118,400		
Amount of Invoice in Pesetas							160,944,745		
							19,055,858		

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BENTLEY PHARMACEUTICALS, INC.										
Management Fees Calculation										
DECEMBER 1999										
	JRMurphy	MDPrice	RMStote	RJGyurik	IVelazco	EMelia	CDBrown			
Salaries/Wages	\$ 29,743	\$ 17,231	\$ 8,333	\$ 12,308	\$ 5,904	\$ 6,894	\$ 4,468			\$ 84,881
Benefits 5%	1,487	862	417	615	295	345	223			5,480
Outside Services	23,622	28,632	3,579	7,158	100	5,011	3,479			71,581
	33%	40%	5%	10%		7%	5%			71,581
Travel/Entertainment	1,127	4,423	678	80	-	-	267			
Occupancy	646	646	646	646	646	646	646			
Supplies/Maint.	2,374	100	2,374	2,374	2,374	100	100			
Communication	7,398	8,877	100	100	100	1,195	725			18,494
	40%	48%				7%	5%			18,494
Directors Fees/Ins.	858	858	858	858	-	-	-			
Other gen & admin	6,416	6,416	497	497	497	6,416	6,416			
Sub-totals	\$ 73,672	\$ 68,046	\$ 17,482	\$ 24,637	\$ 9,917	\$ 20,606	\$ 16,325			
Percent	60%	50%	80%	60%	50%	70%	50%			
Allocation	\$ 44,203	\$ 34,023	\$ 13,986	\$ 14,782	\$ 4,958	\$ 14,425	\$ 8,162			\$ 134,539
Total							\$ 134,539			
Cost + %							8.65%			
Say							\$ 146,176			
Peseta/\$							\$ 146,200			
Amount of Invoice in Pesetas							164,51086			
							24,051,488			

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**BENTL035606
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Bentley Pharmaceuticals, Inc.					
Management Fee Summary					
For the year ended December 31, 2000					
	(in pesetas)				
	Per Mgmtnt Fee Invoice	Per Royalty Fee Invoice	Total	Per Spain F/S	Calc
January	16,000,000	6,929,700	22,929,700	22,930,000	14,349,786
February	16,000,000	3,555,272	19,555,272	19,555,000	13,740,014
March	16,000,000	2,153,447	18,153,447	18,153,000	16,840,310
April	16,000,000	3,683,239	19,683,239	19,684,000	14,681,185
May	16,000,000	1,339,433	17,339,433	17,339,000	18,283,705
June	16,000,000	1,089,452	17,089,452	17,090,000	18,746,417
July	16,000,000	975,737	16,975,737	16,975,000	16,165,607
August	4,000,000	1,230,801	5,230,801	5,231,000	16,118,663
September	16,000,000	3,149,742	19,149,742	19,150,000	14,111,719
October	16,000,000	5,994,359	21,994,359	21,994,000	15,395,310
November	16,000,000	2,995,083	18,995,083	18,995,000	14,540,603
December	16,000,000	1,895,691	17,895,691	17,896,000	16,208,990
	180,000,000	34,991,956	214,991,956	214,992,000	189,182,309

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BENTLEY PHARMACEUTICALS, INC.									
Management Fees Calculation									
JANUARY 2000									
	JRMurphy	MDPrice	RMSlote	RJGyurik	EMelia	CDBrown			
Salaries/Wages	\$ 25,858	\$ 14,700	\$ 6,901	\$ 10,500	\$ 5,786	\$ 3,170			
Benefits 30%	7,757	4,410	2,070	3,150	1,736	951	21,030		
Outside Services	15,678	19,003	2,375	4,751	3,326	2,375	47,508		
	33%	40%	5%	10%	7%	5%			
Travel/Entertainment	4,796	-	-	117	482	-	5,278	117	59
Occupancy	683	683	683	683	683	683	4,784	683	
Supplies/Maint.	905	207	698	698	207	207	828	2791	698
Communication	8,669	10,403	100	100	1,517	884	21,672	-	
	40%	48%			7%	5%			
Director Ins.	858	858	858	858	-	-			
Other gen & admin	2,504	2,486	18	18	2,486	2,486	9,943	73	18
Sub-totals	\$ 67,708	\$ 52,751	\$ 13,704	\$ 20,875	\$ 16,223	\$ 10,756			
			80	60	70				
Percent	50%	40%	30%	30%	60%	50%			
Allocation	\$ 33,854	\$ 21,100	\$ 4,111	\$ 6,263	\$ 9,734	\$ 5,378			
Total									
Cost + %						\$ 80,440			
						8.65%			
Say						\$ 87,398			
Peseta/\$						\$ 87,400			
Amount of Invoice in Pesetas						164,1852			
						14,349,786			

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BENTLEY PHARMACEUTICALS, INC.									
Management Fees Calculation									
FEBRUARY 2000									
	JRMurphy	MDPrice	RMStote	RJGyurik	EMelia	CDBrown			
Salaries/Wages	\$ 25,858	\$ 14,700	\$ 11,198	\$ 10,500	\$ 5,786	\$ 3,170			
Benefits 30%	7,757	4,410	3,359	3,150	1,736	951	21,364	21,662	
Outside Services	11,341	13,747	1,718	3,437	2,406	1,718	34,368	-	
	33%	40%	5%	10%	7%	5%			
Travel/Entertainment	5,004	-	1,526	-	-	-	5,004	1,626	(1)
Occupancy	683	683	683	683	683	683	4,784	683	
Supplies/Maint.	474	370	104	104	370	370	1,479	416	104
Communication	8,669	10,403	100	100	1,517	884	21,672	-	(3,597)
	40%	48%			7%	5%			
Director Ins.	858	858	858	858	-	-			
Other gen & admin	1,847	1,563	284	284	1,563	1,563	6,262	1,136	284
Sub-totals	\$ 62,492	\$ 46,735	\$ 19,931	\$ 19,116	\$ 14,061	\$ 9,339			
Percent	50%	40%	30%	30%	60%	50%			
Allocation	\$ 31,246	\$ 18,694	\$ 5,979	\$ 5,735	\$ 8,437	\$ 4,670			
Total									
Cost + %							\$ 74,760		
							8.65%		
Say							\$ 81,227		
Peseta/\$							\$ 81,200		
Amount of Invoice in Pesetas							169,212		
							13,740,014		

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BENTLEY PHARMACEUTICALS, INC.									
Management Fees Calculation									
MARCH 2000									
	JRMurphy	MDPrice	RMState	RJGyuntik	EMelia	CDBrown			
Salaries/Wages	\$ 38,283	\$ 16,882	\$ 8,333	\$ 11,288	\$ 5,786	\$ 3,488			
Benefits 30%	11,485	5,065	2,500	3,386	1,736	1,046	25,218	34,512	
Outside Services	12,977	15,730	1,966	3,932	2,753	1,966	39,324	-	
	33%	40%	5%	10%	7%	5%			
Travel/Entertainment	5,611	10,994	-	66	1,491	-	18,096	66	1
Occupancy	683	683	683	683	683	683	4,784	683	
Supplies/Maint.	612	270	342	342	270	270	1,081	1366	342
Communication	6,256	7,507	100	100	1,095	582	15,640	-	
	40%	40%			7%	5%			
Director Ins.	858	858	858	858	-	-			
Other gen & admin	2,710	2,545	166	166	2,545	2,545	10,178	862	166 * G&A deducted State of NH Tax
Sub-totals	\$ 79,475	\$ 60,534	\$ 14,947	\$ 20,821	\$ 16,359	\$ 10,581			
Percent	50%	40%	30%	30%	60%	50%			
Allocation	\$ 39,738	\$ 24,214	\$ 4,484	\$ 6,246	\$ 9,815	\$ 5,290			
Total									
Cost + %						\$ 89,788			
						8.65%			
Say						\$ 97,554			
Peseta/\$						\$ 97,600			
Amount of Invoice in Pesetas						172,544,159			
						16,840,310			

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BENTLEY PHARMACEUTICALS, INC.									
Management Fees Calculation									
APRIL 2000									
	JRMurphy	MDPrica	RMStale	RJGvutik	EMalla	GDBrown			
Salaries/Wages	\$ 30,000	\$ 16,428	\$ 11,719	\$ 11,550	\$ 5,766	\$ 3,480			
Benefits 28%	8,400	4,320	3,281	3,234	1,620	977	21,832	22,574	
Outside Services	11,858	14,373	1,787	3,593	2,515	1,797	35,932	-	
	33%	40%	6%	10%	7%	5%			
Travel/Entertainment	2,335	-	331	256	2,817	-	5,152	587	
Occupancy	683	683	683	683	683	683	4,784	683	
Supplies/Maint.	1,126	246	880	880	246	246	965	3519	880
Communication	6,769	8,123	100	100	1,185	646	16,922	-	
	40%	40%			7%	6%			
Director Ins.	858	858	858	858	-	-			
Other gen & admin	1,557	1,515	42	42	1,515	1,515	6,061	168	42
Sub-totals	\$ 63,587	\$ 45,547	\$ 19,691	\$ 21,196	\$ 16,368	\$ 9,352			
Percent	50%	40%	30%	30%	60%	50%			
Allocation	\$ 31,793	\$ 18,219	\$ 5,907	\$ 6,359	\$ 9,821	\$ 4,676			
Total						\$ 76,775			
Cost + %						8.65%			
Say						\$ 83,416			
Presets/\$						\$ 83,400			
Amount of Invoice in Pesetas						176.0333956			
						14,681,185			

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BENTLEY PHARMACEUTICALS, INC.									
Management Fees Calculation									
JUNE 2000									
	JRMurphy	MDPrice	RMSlote	RJGyunk	EMelia	CDDBrown			
Salaries/Wages	\$ 30,000	\$ 15,428	\$ 7,813	\$ 11,550	\$ 5,786	\$ 3,488			
Benefits 22%	6,600	3,394	1,719	2,541	1,273	767			
Outside Services	17,488	21,198	2,650	5,299	3,710	2,650	16,294	17,302	
	33%	40%	5%	10%	7%	5%	52,994	-	
Travel/Entertainment	8,263	7,455	469	154	-	-	15,718	623	4,991 (4,991)
Occupancy	689	689	689	689	689	689	4,824	689	
Supplies/Maint.	531	145	386	386	145	145	581	1543	386
Communication	17,434	20,921	100	100	3,051	1,979	43,585	-	
	40%	48%			7%	5%			
Director Ins.	858	858	858	858	-	-			
Other gen & admin	2,530	2,438	92	92	2,438	2,438	9,752	369	92
Sub-totals	\$ 84,394	\$ 72,527	\$ 14,776	\$ 21,669	\$ 17,092	\$ 12,157			
Percent	50%	40%	30%	30%	60%	50%			
Allocation	\$ 42,197	\$ 29,011	\$ 4,433	\$ 6,501	\$ 10,255	\$ 6,078			
Total						\$ 98,475			
Cost + %						8.65%			
Say						\$ 106,993			
Peseta/\$						\$ 107,000			
Amount of Invoice in Pesetas						175,200161			
						18,746,417			

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BENTLEY PHARMACEUTICALS, INC.									
Management Fees Calculation									
JULY 2000									
	JRMurphy	MDPrice	RMSState	RJGvurik	EMelia	CDBrown			
Salaries/Wages	\$ 30,000	\$ 15,428	\$ 6,250	\$ 11,550	\$ 14,597	\$ 3,488			
Benefits 19%	5,700	2,931	1,188	2,195	2,773	663	15,449	16,592	
Outside Services	12,152	14,730	1,841	3,683	2,578	1,841	36,825		
	33%	40%	5%	10%	7%	5%			
Travel/Entertainment	10,821	-	-	412	-	-	10,821	412	(5)
Occupancy	689	689	689	689	689	689	4,824	689	
Supplies/Maint.	108	104	4	4	104	104	416	15	4
Communication	9,738	11,686	100	100	1,704	1,017	24,346		
	40%	48%			7%	5%			
Director Ins.	858	858	858	858	-	-			
Other gen & admin	2,365	1,401	964	964	1,401	1,401	5,604	3855	964
Sub-totals	\$ 72,432	\$ 47,828	\$ 11,893	\$ 20,453	\$ 23,847	\$ 9,204			
Percent	50%	40%	30%	30%	60%	50%			
Allocation	\$ 36,216	\$ 19,131	\$ 3,568	\$ 6,136	\$ 14,308	\$ 4,602			
Total						\$ 83,961			
Cost + %						8.65%			
Say						\$ 91,224			
Pesetas/\$						\$ 91,200			
Amount of Invoice in Pesetas						177,254,458			
						16,165,607			

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BENTLEY PHARMACEUTICALS, INC.											
Management Fees Calculation											
AUGUST 2000											
	JRMurphy	MDPrice	RMStolt	RJGyurik	EMelia	QDBrown					
Salaries/Wages	\$ 30,000	\$ 15,428	\$ 6,250	\$ 11,550	\$ 7,408	\$ 3,488					
Benefits 17%	5,100	2,623	1,063	1,964	1,259	593					
Outside Services	13,799	16,726	2,091	4,181	2,927	2,091	12,601	13,649			
	33%	40%	5%	10%	7%	5%	41,814	-			
Travel/Entertainment	10,640	3,886	-	417	1,710	-	16,236	417	(158)	-	(158)
Occupancy	689	689	689	689	689	689	4,824	689			
Supplies/Maint.	506	197	309	309	197	197	789	1234	309		
Communication	7,168	8,602	100	100	1,254	696	17,920	-			
	40%	48%			7%	5%					
Director Ins.	885	885	885	885	-	-					
Other gen & admin	2,173	1,773	400	400	1,773	1,773	7,091	1599	400		
Sub-totals	\$ 70,960	\$ 50,809	\$ 11,786	\$ 20,495	\$ 17,218	\$ 9,527					
Percent	50%	40%	30%	30%	60%	50%					
Allocation	\$ 35,480	\$ 20,324	\$ 3,536	\$ 6,148	\$ 10,331	\$ 4,763					
Total											
Cost + %							\$ 80,582				
							8.65%				
Say							\$ 87,553				
Pesetas/\$							\$ 87,600				
Amount of Invoice in Pesetas							184,003				
							16,118,663				

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BENTLEY PHARMACEUTICALS, INC.									
Management Fees Calculation									
DECEMBER 2000									
	JRMurphy	MDPrice	RMSale	RJGyunk	EMelia	CDBrown			
Salaries/Wages	\$ 30,000	\$ 15,428	\$ 6,534	\$ 11,550	\$ 7,408	\$ 3,488			
Benefits 17%	5,100	2,623	1,128	1,964	1,259	593			
Outside Services	10,871	13,177	1,647	3,294	2,306	1,647	15,608		
	33%	40%	5%	10%	7%	5%			
Travel/Entertainment	2,968	1,059	716	426	150	-	4,997	1,144	(2,339)
Occupancy	618	618	618	618	618	618	5,562	1,854	
Supplies/Maint.	289	192	98	98	192	192	958	390	
Communication	9,814	11,777	100	100	1,718	1,027	24,536	-	(5,000)
	40%	40%			7%	5%			
Director Ins.	885	885	885	885	-	-			
Other gen & admin	5,062	5,349	(287)	(287)	5,349	5,349	21,395	-1,436	(574) * G&A per GL was \$7,240
									* R&D per GL was \$420
Sub-totals	\$ 65,628	\$ 51,908	\$ 11,541	\$ 18,647	\$ 18,999	\$ 12,913			
Percent	50%	40%	30%	30%	60%	50%			
Allocation	\$ 32,814	\$ 20,763	\$ 3,462	\$ 5,594	\$ 11,400	\$ 6,457			
Total									
Cost + %						\$ 80,490			
						8.65%			
Say						\$ 87,452			
Percent/\$						\$ 87,500			
Amount of Invoice in Pesetas						185,245,595			
						16,208,990			

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BENTLEY PHARMACEUTICALS, INC.									
Management Fees Calculation									
YTD September 30, 2001									
	JRMurphy	MDPrice	RMSote	RJGyurik	JAHonvath	PFFitzgibbons	EMellita	CDBrown	Total
Salaries/Bonus	\$ 392,500	\$ 209,000	\$ 99,382	\$ 181,250	\$ 220,148	\$ 72,187	\$ 73,180	\$ 35,329	\$ 1,282,956
Benefits 19.4%	76,209	40,580	19,296	35,192	42,745	14,016	14,205	6,860	249,103
Outside Services	23,715	23,715	23,715	23,715	23,715	23,715	23,715	23,715	189,720
Travel/Entertainment	61,287	22,515	7,066	1,036	13,372	-	11,037	329	116,642
Occupancy	5,506	5,506	5,506	5,506	5,506	5,506	5,506	5,506	44,047
Supplies/Maint.	1,820	1,820	1,820	1,820	1,820	1,820	1,820	1,820	14,562
Communication	21,589	21,589	21,589	21,589	21,589	21,589	21,589	21,589	172,711
Directors Fees/Insurance	17,556	17,556	17,556	17,556	17,556	17,556	17,556	17,556	140,446
Other G&A	13,925	13,925	-	-	13,925	-	13,925	13,925	69,627
Other R&D	3,245	-	3,245	3,245	3,245	3,245	-	-	16,227
Sub-totals	\$ 617,353	\$ 356,206	\$ 199,175	\$ 290,909	\$ 363,621	\$ 159,634	\$ 182,513	\$ 126,629	\$ 2,296,041
Percent	50%	50%	30%	30%	30%	30%	60%	50%	
Allocation	\$ 308,676	\$ 178,103	\$ 59,753	\$ 87,273	\$ 109,086	\$ 47,890	\$ 109,508	\$ 63,314	\$ 963,604
YTD Total - US\$									
Say									\$ 963,604
Pesetas/\$									\$ 1,000,000
YTD Total - Pesetas									185.93
Monthly Total - Pesetas									185,930,000
peseta/euro conversion									20,658,889
Monthly Total - Euros									166.38
									124,166.90
Actual Monthly Total - Euros									120,202.42
Actual Annual Total - Euros									1,442,429.04

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BENTLEY PHARMACEUTICALS, INC.								
Management Fees Calculation								
DECEMBER 2001								
			JRMurphy	MDPrice	RMStote	RJGvurik	EMelia	CDBrown
Salaries/Wages			\$ 30,000	\$ 15,428	\$ 6,634	\$ 11,550	\$ 7,408	\$ 3,488
Benefits 17%	17%		5,100	2,623	1,128	1,964	1,259	593
Outside Services			10,871	13,177	1,647	3,294	2,306	1,647
			33%	40%	5%	10%	7%	5%
Travel/Entertainment			2,988	1,859	718	426	150	-
Occupancy			618	618	618	618	618	618
Supplies/Maint.			289	192	98	98	192	192
Communication			9,814	11,777	100	100	1,718	1,027
			40%	48%			7%	5%
Director Ins.			885	885	885	885	-	-
Other gen & admin			5,062	5,349	(287)	(287)	5,349	5,349
Sub-totals			\$ 65,628	\$ 51,908	\$ 11,541	\$ 18,647	\$ 18,999	\$ 12,913
Percent			50%	40%	30%	30%	60%	50%
Allocation			\$ 32,814	\$ 20,763	\$ 3,462	\$ 5,594	\$ 11,400	\$ 6,457
Total								\$ 80,490
Cost + %								8.65%
Say								\$ 87,452
Peseta/\$								\$ 87,500
Amount of Invoice in Pesetas							open	1
								87,500

B1149



Bentley Pharmaceuticals, Inc.
4890 West Kennedy Boulevard, Suite 400
Tampa, Florida 33609
Tel. 813.281.0961
Fax. 813.282.8941

C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

LIBERADO

INVOICE N° 1998/005

INVOICE DATE: 31st May, 1998

MERO: 80.147
FECHA: 08.05.98

Description	Currency	Total Amount
Management Fees Agreement	USD	32.950
Invoice Amount	USD	32.950

BENTLEY PHARMACEUTICALS, INC.
PHONE 813.281.0961
FAX 813.282.8941

CUENTA	IMPORTE	DEBE
629 2010101	5.000.000	D
402 0010101	5.000.000	H
ASIENTO	FECHA	FIRMA

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Bentley Pharmaceuticals, Inc.
4890 West Kennedy Boulevard, Suite 400
Tampa, Florida 33609
Tel. 813.281.0961
Fax. 813.282.8941

C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1998/006

INVOICE DATE: 30th June, 1998

LIBERADO

NUMERO: 80.174
FECHA: 08.06.98

Description	Currency	Total Amount
Management Fees Agreement	USD	32.950
<i>Invoice Amount</i>	<i>USD</i>	<i>32.950</i>

BENTLEY PHARMACEUTICALS, INC.
PHONE 813. 281. 0961
FAX 813. 282. 8941

CUENTA	CALCULO	DEBITO
6292010101	5.000.000	D
4070010701	5.000.000	H
ASIENTO	FECHA	FIRMA

BEL080372
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B1151



Bentley Pharmaceuticals, Inc.
4890 West Kennedy Boulevard, Suite 400
Tampa, Florida 33609
Tel. 813.281.0961
Fax. 813.282.8941

C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1998/007

INVOICE DATE: 31st July, 1998

CONTABILIZADO
NUMERO: 80.369
FEC: ... 08/10/98

Description	Currency	Total Amount
Management Fees Agreement	USD	95.560
<i>Invoice Amount</i>	<i>USD</i>	<i>95.560</i>

BENTLEY PHARMACEUTICALS, INC.
PHONE 813. 281. 0961
FAX 813. 282. 8941

CUENTA	MONTO	D/H
6292010101	15.472.850	D
4020010201	15.472.850	H
ASIENTO	FECHA	FIRMA

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Bentley Pharmaceuticals, Inc.
4890 West Kennedy Boulevard, Suite 400
Tampa, Florida 33609
Tel. 813.281.0961
Fax. 813.282.8941

C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1998/008

INVOICE DATE: 31st August, 1998

CONTABILIZADO
NUMERO: 80.359
FECHA: 08/10/98

Description	Currency	Total Amount
Management Fees Agreement	USD	95.560
Invoice Amount		USD 95.560

CUENTA	IMPORTE	D/H
6292010101	14.143.553	D
4020010201	14.143.553	H
ASIENTO	FECHA	FIRMA

BENTLEY PHARMACEUTICALS, INC.
PHONE 813.281.0961
FAX 813.282.8941

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4890 West Kennedy Boulevard, Suite 400
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Fax. 813.282.8941

C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1998/009

INVOICE DATE: 30th September, 1998

CONTABILIZADO

NUMERO: 80.369

FECHA: 08/10/98

Description	Currency	Total Amount
Management Fees Agreement	USD	95.560
<i>Invoice Amount</i>		<i>USD 95.560</i>

BENTLEY PHARMACEUTICALS, INC.
PHONE 813. 281. 0961
FAX 813. 282. 8941

6252010101	13983.803	DRH
4020010201	3983.803	D
		H
ASIENTO	FECHA	FIRMA

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Bentley Pharmaceuticals, Inc.
 4890 West Kennedy Boulevard, Suite 400
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 Fax. 813.282.8941

C.I.F. A78964038
 LABORATORIOS BELMAC, S.A.

Montecaragón, 9
 28033 Madrid
 Madrid (Spain)

INVOICE N° 1998/010

INVOICE DATE: 31st October, 1998

CONTABILIZADO
 NUMERO: 80.369
 FECHA: 08.10.98

Description	Currency	Total Amount
Management Fees Agreement	USD	95.560
<i>Invoice Amount</i>	<i>USD</i>	<i>95.560</i>

CUENTA	IMPORTE	LIB
629 70 10101	14.500.000	D
40200 10201	14.500.000	H
ASIENTO	FECHA	FIRMA

BENTLEY PHARMACEUTICALS, INC.
 PHONE 813.281.0961
 FAX 813.282.8941

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LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

CONTABILIZADO

NUMERO: 80.424
FECHA: 08.11.98

INVOICE N° 1998/011

INVOICE DATE: 30th November, 1998

Description	Currency	Total Amount
Management Fees Agreement	USD	95.560
Invoice Amount		USD 95.560

CUENTA	DEBITO	DA
62520101	14.500.000	D
4020010201	14.500.000	H
ASIENTO	FECHA	PARA

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PHONE 813. 281. 0961
FAX 813. 282. 8941

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C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1998/012

INVOICE DATE: 31st December, 1998

ABILIZADO
CERO: 80.510
12.12.98

Description	Currency	Total Amount
Management Fees Agreement	USD	95.560
Invoice Amount	USD	95.560

ASIENTO	FECHA	FIRMA
6292010101	14.500.000	0
4020010201	14.500.000	4

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PHONE 813. 281. 0961
FAX 813. 282. 8941

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**Montearagón, 9
28033 Madrid
Madrid (Spain)**

UTILIZADO
80.060
08.01.99

IDENTA	IDENTE	DMT
6292010101	14. Sao Paulo	0
4020010201	14. Sao Paulo	7

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Bentley Pharmaceuticals, Inc.
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C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montecaragón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1999/002

INVOICE DATE: 28th February 1999

ABILIZADO
80.104
08.02.99

Description	Currency	Total Amount
Management Fees Agreement	Pescetas	15.213.000
Invoice Amount		15.213.000

629 2010101	15.213.000	D
4070010701	15.213.000	H

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

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Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1999/003

INVOICE DATE: 30th March 1999

LIBRILIZADO
NUMERO 80.160
08.03.99

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	15213.000
Invoice Amount		15.213.000

CUENTAS		OH
6292010101	15.213.000	0
4020010101	15.213.000	1

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Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1999/004

INVOICE DATE: 30th April 1999

CONTABILIZADO

NUMERO: 80.217

FECHA: 08.04.99

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	15.000.000
Invoice Amount		15.000.000

CUENTA	DEBITO	CREDITO
629701010	15.000.000	0
402001070	15.000.000	4
ASIENTO	FECHA	FECHA

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LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1999/005

INVOICE DATE: 31st May 1999

LABILIZADO

50.275

08.05.99

Description	Currency	Total Amount
Management Fees Agreement	Pescetas	15.000.000
Invoice Amount		15.000.000

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 683 964 8006
FAX 00 1 683 964 6889

629.70.10101	15.000.000	0
402.00.10101	15.000.000	1

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B1162



Bentley Pharmaceuticals, Inc.
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Fax. 813.282.8941

C.L.F. A78964038
LABORATORIOS BELMAC, S.A.

Monteauragón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1999/006

INVOICE DATE: 30th June 1999

CONTABILIZADO

NUMERO: 80.321

FECHA: 08.06.99

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	15.000.000
<i>Invoice Amount</i>		<i>15.000.000</i>

NUMERO	FECHA	D/H
6292010101	15.000.000	0
4020010201	15.000.000	4

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PHONE 001 603 964 8006
FAX 001 603 964 6889

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LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1999/007

INVOICE DATE: 31st July 1999

CANTABILIZADO
NUMERO: 80.368
FECHA: 08.07.99

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	15.000.000
Invoice Amount		15.000.000

FECHA	CANTIDAD	MONEDA
6/29/2010	15.000.000	0
4/22/2010	15.000.000	4
ASIENTO	FORMA	

BENTLEY PHARMACEUTICALS, INC.
PHONE 001 603 964 8006
FAX 001 603 964 6889

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LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1999/008

INVOICE DATE: 31st August 1999

ABILIZADO

80.409
08.08.99

[Handwritten signature]

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	15.000.000
<i>Invoice Amount</i>		<i>15.000.000</i>

CUENTA	IMPORTE	D/H
629.20.10101	15.000.000	0
40.200.10201	15.000.000	11
ASIENTO	FECHA	

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Monteargón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1999/009

INVOICE DATE: 30th September 1999

ABILIZADO
NUMERO: 80.480
08.09.99

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	15.000.000
Invoice Amount		15.000.000

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

629010101	15.000.000	9
4020010201	15.000.000	7
ASIENTO	FECHA	

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Fax. 813.282.8941

C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1999/010

INVOICE DATE: 31st October 1999

CONTABILIZADO

NUMERO: 80.571

FECHA: 08.10.99

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	15.000.000
<i>Invoice Amount</i>		<i>15.000.000</i>

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

6292019101	15.000.000	0
4030010101	15.000.000	4
ASIENTO	FECHA	FECHA

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Bentley Pharmaceuticals, Inc.
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C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1999/011

INVOICE DATE: 30th November 1999

CONTABILIZADO
NUMERO: 80.635
FECHA: 08.11.99

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	15.000.000
Invoice Amount		15.000.000

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

ASIENTO	FECHA	DEBITO	CREDITO
629010101	15.000.000	1	
407010101	15.000.000		4

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LABORATORIOS BELMAC, S.A.

Montecaragón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 1999/012

INVOICE DATE: 31ST December 1999

CONTABILIZADO

NUMERO: 1732
FECHA: 31.12.99

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	60.113.896
Invoice Amount		60.113.896

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

629.0180501	60.113.896	D
402.0010201	60.113.896	Y
ASIENTO	URCA	PAIS

BEL080390
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B1169



Bentley Pharmaceuticals, Inc.
4890 West Kennedy Boulevard, Suite 400
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Fax. 813.282.8941

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LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2000/001

INVOICE DATE: 31ST January 2000

CONTABILIZADO
NUMERO 2008
FECHA 31.01.00

Description	Currency	Total Amount
Management Fees Agreement	Pescas	16.000.000
Invoice Amount		16.000.000

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

629 1100001	16.000.000	0
402 m10201	16.000.000	4

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Bentley Pharmaceuticals, Inc.
4890 West Kennedy Boulevard, Suite 400
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Fax. 813.282.8941

C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montesagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2000/002

INVOICE DATE: 29th February 2000

ABILIZADO
4.118
28.02.00

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	16.000.000
<i>Invoice Amount</i>		<i>16.000.000</i>

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

629.1100001	16.000.000	9
4020010201	16.000.000	14

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Fax. 813.282.8941

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LABORATORIOS BELMAC, S.A.

Montecaragón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2000/003

INVOICE DATE: 30th March 2000

CONTABILIZADO
NUMER 7-008
FECH 31-03-00

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	16.000.000
Invoice Amount		16.000.000

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

629.1100001	16.000.000	2
402.0016201	16.000.000	14

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 LABORATORIOS BELMAC, S.A.

Montearagón, 9
 28033 Madrid
 Madrid (Spain)

INVOICE N° 2000/004

INVOICE DATE: 30th April 2000

IZADO

9.082

30.04.00

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	16.000.000
<i>Invoice Amount</i>		<i>16.000.000</i>

BENTLEY PHARMACEUTICALS, INC.
 PHONE 00 1 603 964 8006
 FAX 00 1 603 964 6889

629116000/	16.000.000	D
4070010701	16.000.000	H

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B1173



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 LABORATORIOS BELMAC, S.A.

Montearagón, 9
 28033 Madrid
 Madrid (Spain)

INVOICE N° 2000/005

INVOICE DATE: 31st May 2000

CONTABILIZADO
 NUMERO: 11.924
 FECHA: 31.05.00 *R*

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	16.000.000
Invoice Amount		16.000.000

BENTLEY PHARMACEUTICALS, INC.
 PHONE 00 1 603 964 8006
 FAX 00 1 603 964 6889

629.000.000	16.000.000	0
402.000.000	16.000.000	4

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B1174



Bentley Pharmaceuticals, Inc.
4890 West Kennedy Boulevard, Suite 400
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C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2000/006

INVOICE DATE: 30th June 2000

ABILIZADO
NUMERO: 14.768
11.000
30.06.00

Description	Currency	Total Amount
Management Fees Agreement	Pescetas	16.000.000
Invoice Amount		16.000.000

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

629/1100001	16.000.000	0
402.00/10201	16.000.000	10

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**Montearagón, 9
28033 Madrid
Madrid (Spain)**

STAMPED
NUMERO

NUMERO: 17.277

3107.00

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	16,000,000
Invoice Amount		16,000,000

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

CUENTA		DVH
6291100001	16.000.000	D
4070010701	16.000.000	H
A TENDIO	DECOMA	

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B1176



Bentley Pharmaceuticals, Inc.
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LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2000/008

INVOICE DATE: 31st August 2000

CONTABILIZADA

NUMERO: 18.866

FEC... 31.08.00

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	4.000.000
Invoice Amount		4.000.000

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

679 (1000000)	4.000.000	0
4620010701	4.000.000	4

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B1177



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LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2000/009

INVOICE DATE: 30th September 2000

CONTAS
NUMER 21.964
FECH 30.9.00 *be*

Description	Currency	Total Amount
Management Fees Agreement	Pescetas	16.000.000
<i>Invoice Amount</i>		<i>16.000.000</i>

BENTLEY PHARMACEUTICALS, INC.
PHONE 001 603 964 8006
FAX 001 603 964 6889

NUMER	FECH	E/H
629.1100001	16.000.000	D
407.0016701	16.000.000	H

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B1178



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C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2000/010

INVOICE DATE: 31st October 2000

CONTABILIZA

NUMERO: 24.767

FECHA

31.10.00

Description	Currency	Total Amount
Management Fees Agreement	Pescetas	16.000.000
<i>Invoice Amount</i>		<i>16.000.000</i>

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

CUBETA	FECHA	MON
6291100001	16.000.000	D
4026010701	16.000.000	H
AGENTE	FECHA	

BEL080400
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**Montearagón, 9
28033 Madrid
Madrid (Spain)**

CONFIDENTIAL

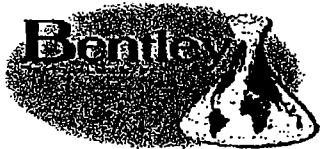
REC... 30.12.00

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

CUENTA	DEBITO	CREDITO
6291100001	16.000.000	0
4070010201	16.000.000	4
TOTAL		

BEL080402
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B1181



Bentley Pharmaceuticals, Inc.
4890 West Kennedy Boulevard, Suite 400
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Fax. 813.282.8941

C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2001/001

INVOICE DATE: 31st January 2001

RECEBIDO
NUMERO: 3662
FECHA: 30.01.01

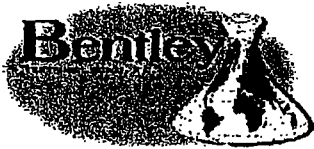
Description	Currency	Total Amount
Management Fees Agreement	Pesetas	16.000.000
<i>Invoice Amount</i>		<i>16.000.000</i>

CUENTA	IMPORTE	W/H
629 110000	16.000.000	D
40 20010201	16.000.000	H
ASIENTO	FECHA	FIRMA

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

BEL080403
HIGHLY CONFIDENTIAL

B1182



Bentley Pharmaceuticals, Inc.
4890 West Kennedy Boulevard, Suite 400
Tampa, Florida
Tel. 813.281.0961
Fax. 813.282.8941

C.I.F. A78964038
LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2001/002

INVOICE DATE: 28th February 2001

RECEIVED
6279
280201

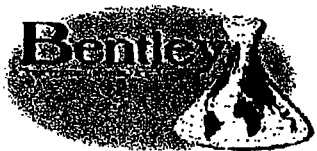
Description	Currency	Total Amount
Management Fees Agreement	Pesetas	16.000.000
<i>Invoice Amount</i>		<i>16.000.000</i>

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

ASIENTO	FECHA	FIRMA
629110001	16.000.000	0
4020010201	16.000.000	17

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B1183



Bentley Pharmaceuticals, Inc.
4890 West Kennedy Boulevard, Suite 400
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LABORATORIOS BELMAC, S.A.

Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2001/003

INVOICE DATE: 31st March 2001

IMPORTE
NUMERO: 9391
FECHA: 3003 01

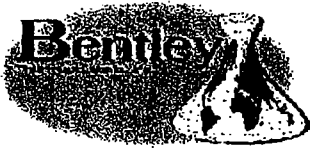
Description	Currency	Total Amount
Management Fees Agreement	Pesetas	16.000.000
Invoice Amount		16.000.000

CUENTA	IMPORTE	D/H
6291100001	16.000.000	D
4020010201	16.000.000	H
ASIENTO	FECHA	FIRMA

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

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Montearagón, 9
28033 Madrid
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INVOICE N° 2001/004

INVOICE DATE: 30^a April 2001

RECEIVED
NUMERO: 12291
FECHA: 30/04/01

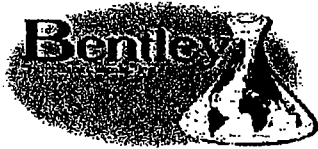
Description	Currency	Total Amount
Management Fees Agreement	Pesetas	16.000.000
Invoice Amount		16.000.000

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

CUENTA	IMPORTE	DTL.
6296110001	16.000.000	0
4020010201	16.000.000	17
ASIENTO	FECHA	FIRMA

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Montcaragón, 9
28033 Madrid
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INVOICE N° 2001/005

INVOICE DATE: 31st May 2001

NUMERO: 15478
FEL: 3005-01

Description	Currency	Total Amount
Management Fees Agreement	Pescetas	16.000.000
<i>Invoice Amount</i>		<i>16.000.000</i>

BENTLEY PHARMACEUTICALS, INC.
PHONE 001 603 964 8006
FAX 001 603 964 6889

ASIENTO	FECHA	FIRMA
6290110001	16.000.000	D
4020010201	16.000.000	H

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Montearagón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2001/006

INVOICE DATE: 30th June 2001

RECEIVED
18.497
300601

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	16.000.000
<i>Invoice Amount</i>		<i>16.000.000</i>

BENTLEY PHARMACEUTICALS, INC.
PHONE 001 603 964 8006
FAX 001 603 964 6889

ASIENTO	FECHA	FIRMA
629 01/000	16.000.000	D
4020010201	16.000.000	H

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Bentley Pharmaceuticals, Inc.
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Montecaragón, 9
28033 Madrid
Madrid (Spain)

INVOICE N° 2001/007

INVOICE DATE: 31st July 2001

RECEIVED
21.393
31.07.01

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	16.000.000
Invoice Amount		16.000.000

BENTLEY PHARMACEUTICALS, INC.
PHONE 00 1 603 964 8006
FAX 00 1 603 964 6889

CUENTA	IMPORTE	D/F
6290110001	16.000.000	D
4020010701	16.000.000	H
ASIENTO	FECHA	FIRMA

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Bentley Pharmaceuticals, Inc.
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28033 Madrid
Madrid (Spain)

INVOICE N° 2001/008

INVOICE DATE: 31st August 2001

RECEIVED
23.244
31.08.01

Description	Currency	Total Amount
Management Fees Agreement	Pesetas	4.000.000
<i>Invoice Amount</i>		<i>4.000.000</i>

BENTLEY PHARMACEUTICALS, INC.
PHONE 001 603 964 8006
FAX 001 603 964 6889

629016000	4.000.000	0
4020010201	4.000.000	17
ASIENTO	FECHA	FIRMA

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